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20
21 **UNITED STATES DISTRICT COURT**
22
23 **CENTRAL DISTRICT OF CALIFORNIA**

24 ANDREA S. SANDERS, an individual,
25 MARSHALL C. SANDERS, an
individual,

26 Plaintiffs,

27 v.

28 LOANCARE, LLC, a Virginia limited
liability company; and DOES 1-50,
inclusive,

Defendants.

CASE NO.: 2:18-CV-09376-PA (RAOx)

Assigned to the Honorable Percy Anderson

**PLAINTIFFS' NOTICE OF UNOPPOSED
MOTION AND UNOPPOSED MOTION
FOR AN AWARD OF CLASS
REPRESENTATIVES INCENTIVE
PAYMENT AND ATTORNEYS' FEES
AND COSTS**

Date: November 16, 2020
Time: 10:00 a.m.
Courtroom: 9A

First Removal Notice: November 2, 2018
Amended Removal: November 12, 2018
FAC Filed on: April 2, 2019
SAC Filed on: April 14, 2020

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on November 16, 2020, or as soon thereafter as
3 the matter can be heard, in Courtroom 9A of the United States Courthouse located at
4 350 W. 1st Street, 6th Floor, Los Angeles, CA 90012, Class Representatives Andrea S.
5 Sanders and Marshall C. Sanders (“Class Representatives”), and Class Counsel
6 Zimmerman Reed, LLP and Gubernick Law, P.L.L.C. (together, “Class Counsel”) will
7 and hereby do move for an Order, consistent with the terms of the Class Action
8 Settlement in this case, awarding: (a) a Service Award of \$7,500 to the Named
9 Plaintiffs and Class Representatives; and (b) Class Counsel’s attorneys’ fees and costs
10 in the amount of \$880,688.71.

11 This motion is based on this Notice of Motion and Motion, the accompanying
12 Memorandum of Points and Authorities, the Declarations of Christopher P. Ridout and
13 Benjamin Gubernick, the Class Action Amended Settlement Agreement (the
14 “Settlement”) previously filed with the Court (Dkt. 82-1.), and all papers filed in
15 support thereof, the Court’s Order dated March 24, 2020 granting Plaintiff’s Unopposed
16 Renewed Motion for Class Certification and Preliminary Approval of Settlement
17 Agreement (Dkt. 88.), the argument of counsel at the hearing of this Motion, all papers
18 and records on file in the matter, and such other matters as the Court may consider.

19 Respectfully submitted,

20 ZIMMERMAN REED LLP

21 Date: October 19, 2020

22 By: /s/ Christopher P. Ridout
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Attorneys for Plaintiffs